

Remarks

Upon entry of the foregoing amendment, claims **1-15 and 17-22** are pending in the application, with claims 1, 8, 18, 19, and 20 being the independent claims. Claim 16 is sought to be cancelled without prejudice to or disclaimer of the subject matter therein. New claim 22 is sought to be added. Claims 1, 3, 5, 8, 10, 12, and 18-21 have been amended in response to the current Office Action and/or to correct minor informalities. The specification has also been amended throughout to correct minor informalities. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

On page 2, the current Office Action states that claims 1-3, 5-10, 12-18, and 20-21 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,266,269 B1 to Karp *et al.* (hereinafter, "Karp"). Applicants respectfully disagree. Karp does not teach or suggest all of the claim elements of the rejected independent claims. For example, Karp does not teach or suggest:

 a capacitor having an oxide layer capable of passing direct gate tunneling current;

 a write switch including plural transistors each having a gate oxide layer that is thicker than said capacitor oxide layer so as to have a voltage tolerance higher than that of said capacitor oxide layer; and

 a read switch including plural transistors coupled to said capacitor, each read switch transistor having a gate oxide layer that is thicker than said

capacitor oxide layer so as to have a voltage tolerance higher than that of said capacitor oxide layer;

as claimed in independent claim 1. Similarly, Karp does not teach or suggest:

forming a capacitor having an oxide layer capable of passing direct gate tunneling current;

forming a write switch including plural transistors each having a gate oxide layer that is thicker than said capacitor oxide layer so as to have a voltage tolerance higher than that of said capacitor oxide layer; and

forming a read switch including plural transistors each having a gate oxide layer that is thicker than said capacitor oxide layer so as to have a voltage tolerance higher than that of said capacitor oxide layer;

as claimed in independent claim 8. Nor does Karp teach or suggest:

a capacitor having an oxide layer, approximately 20Å thick, capable of passing direct gate tunneling current;

a write switch including plural transistors having a voltage tolerance higher than that of said capacitor; and

a read switch including plural transistors coupled to said capacitor, each read switch transistor having a voltage tolerance higher than that of said capacitor;

as claimed in independent claim 18. Finally, Karp does not teach or suggest:

a transistor configured as a capacitor and having an oxide layer capable of passing direct gate tunneling current;

a write circuit, including:

a first switch transistor connected between a first terminal of said capacitor and a first voltage, and

a second switch transistor connected between a second side of said capacitor opposing said first side and a second voltage; and

a read switch including plural transistors coupled to said capacitor;

as claimed in independent claim 20.

For at least the reasons stated above, Applicants believe that independent claims 1, 8, 18, and 20, and the claims depending therefrom, are patentable. Therefore, Applicants respectfully request that these rejections be reconsidered and withdrawn.

Rejections under 35 U.S.C. § 103

On page 5, the current Office Action states that claims 4, 11, and 19 are rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Karp in view of U.S. Patent Application No. 2001/0022746 of Kim *et al.* (hereinafter, "Kim"). Applicants respectfully disagree. Regarding claims 4 and 11, neither Karp nor Kim, alone or in combination, teaches or suggests all of the claim elements of the corresponding independent claims 1 and 8, as exemplified above. Similarly, neither Karp nor Kim, alone or in combination, teaches or suggests all of the claim elements of independent claim 19. For example, neither Karp nor Kim, alone or in combination, teaches or suggests:

- a capacitor having an oxide layer capable of passing direct gate tunneling current;
- a write switch including plural transistors having a voltage tolerance higher than that of said capacitor; and
- a read switch including plural transistors coupled to said capacitor, each read switch transistor having a voltage tolerance higher than that of said capacitor;

as claimed in independent claim 19.

For at least the reasons stated above, Applicants believe that independent claims 1, 8, and 19, and the claims depending therefrom (which include claims 4 and 11), are patentable. Therefore, Applicants respectfully request that these rejections be reconsidered and withdrawn.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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